[PROPOSED] ORDER GRANTING MOTION TO SEAL

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[PROPOSED] ORDER

Before the Court is Plaintiffs' Motion Re: Sealing Portions of Plaintiffs' Objections to the Special Master's Report and Orders on Referred Discovery Disputes (Dkt. 524) ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Objections to the	GRANTED as to the	The information requested to be
Special Master's Report and	portions at:	sealed contains Google's highly
Orders on Referred	1	confidential and proprietary
Discovery Disputes	Pages 1-3, 5-6	information regarding highly
		sensitive features of Google's
		internal systems and operations,
		including various types of Google's
		internal projects, identifiers, data
		signals, and logs, and their
		proprietary functionalities, as well
		as internal metrics, that Google
		maintains as confidential in the
		ordinary course of its business and
		is not generally known to the public
		or Google's competitors. Such
		confidential and proprietary
		information reveals Google's
		internal strategies, system designs,
		and business practices for operating
		and maintaining many of its
		important services, and falls within
		the protected scope of the Protective
		Order entered in this action. See
		Dkt. 81 at 2-3. Public disclosure of
		such confidential and proprietary
		information could affect Google's
		competitive standing as competitors
		may alter their systems and
		practices relating to competing
		products. It may also place Google
		at an increased risk of cybersecurity
		threats, as third parties may seek to use the information to compromise
		Google's internal practices relating
		to competing products.
		to competing products.

1	Exhibit 1 to Declaration of	GRANTED as to the	The information requested to be
2	Mark C. Mao in Support of	portions at:	sealed contains Google's highly
	Plaintiffs' Objections to the Special Master's	Pages 123:6-7, 173:4,	confidential and proprietary information regarding highly
3	Recommended Preservation	174:15, 174:24	sensitive features of Google's
4	Plan		internal systems and operations, including various types of Google's
5			internal projects, identifiers, and
6			their proprietary functionalities, that Google maintains as
7			confidential in the ordinary course
			of its business and is not generally known to the public or Google's
8			competitors. Such confidential and
9			proprietary information reveals
10			Google's internal strategies, system designs, and business practices for
11			operating and maintaining many of its important services, and falls
12			within the protected scope of the
13			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public
			disclosure of such confidential and
14			proprietary information could affect
15			Google's competitive standing as competitors may alter their systems
16			and practices relating to competing
17			products. It may also place Google at an increased risk of cybersecurity
18			threats, as third parties may seek to
19			use the information to compromise Google's internal practices relating
	Destantion of Chairteet	CD ANITED and a disc	to competing products.
20	Declaration of Christopher Thompson in Support of	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly
21	Plaintiffs' Objections to the Special Master's	PDF Pages 3:21-22, 4:1,	confidential and proprietary information regarding highly
22	Recommended Preservation	4:3-4, 4:14, 4:26	information regarding highly sensitive features of Google's
23	Plan		internal systems and operations,
24			including various types of Google's internal projects, data signals, and
25			logs, and their proprietary
26			functionalities, as well as internal metrics, that Google maintains as
			confidential in the ordinary course
27			of its business and is not generally known to the public or Google's
28			competitors. Such confidential and

1			proprietary information reveals
2			Google's internal strategies, system
			designs, and business practices for operating and maintaining many of
3			its important services, and falls
4			within the protected scope of the
			Protective Order entered in this
5			action. See Dkt. 81 at 2-3. Public
6			disclosure of such confidential and
			proprietary information could affect Google's competitive standing as
7			competitors may alter their systems
8			and practices relating to competing
			products. It may also place Google
9			at an increased risk of cybersecurity
10			threats, as third parties may seek to
			use the information to compromise Google's internal practices relating
11			to competing products.
12	Exhibit A to Thompson	GRANTED as to the	The information requested to be
12	Declaration	portions at:	sealed contains Google's highly
13		0 1 1:	confidential and proprietary
14		Sealed in entirety	information regarding highly sensitive features of Google's
15			internal systems and operations,
13			including various types of Google's
16			internal projects, identifiers, data
17			signals, and logs, and their
1/			proprietary functionalities, as well as internal metrics, that Google
18			maintains as confidential in the
19			ordinary course of its business and
			is not generally known to the public
20			or Google's competitors. Such
21			confidential and proprietary information reveals Google's
			internal strategies, system designs,
22			and business practices for operating
23			and maintaining many of its
24			important services, and falls within
24			the protected scope of the Protective Order entered in this action. See
25			Dkt. 81 at 2-3. Public disclosure of
26			such confidential and proprietary
20			information could affect Google's
27			competitive standing as competitors
28			may alter their systems and
20			practices relating to competing

1					products. It may also place Google
2					at an increased risk of cybersecurity
_					threats, as third parties may seek to
3					use the information to compromise Google's internal practices relating
4					to competing products.
4	Exhibit B	to	Thompson	GRANTED as to the	The information requested to be
5	Declaration	••	1110111P2011	portions at:	sealed contains Google's highly
					confidential and proprietary
6				Sealed in entirety	information regarding highly
7					sensitive features of Google's
					internal systems and operations,
8					including various types of Google's internal projects, identifiers, data
9					signals, and logs, and their
10					proprietary functionalities, as well
10					as internal metrics, that Google
11					maintains as confidential in the
12					ordinary course of its business and is not generally known to the public
12					or Google's competitors. Such
13					confidential and proprietary
14					information reveals Google's
14					internal strategies, system designs,
15					and business practices for operating
16					and maintaining many of its important services, and falls within
10					the protected scope of the Protective
17					Order entered in this action. See
18					Dkt. 81 at 2-3. Public disclosure of
10					such confidential and proprietary
19					information could affect Google's
20					competitive standing as competitors may alter their systems and
20					practices relating to competing
21					products. It may also place Google
22					at an increased risk of cybersecurity
					threats, as third parties may seek to
23					use the information to compromise
24					Google's internal practices relating to competing products.
					to competing products.
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2	SO ORDERED.	
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4	DATED:	HON GUGAN WAN WELLEN
5		HON. SUSAN VAN KEULEN United States Magistrate Judge
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		5 Case No. 4:20-cv-03664-YGR-SVK [PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO SEAL